

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
GORETTI MEDEIROS,)	
)	
Plaintiffs)	
)	
VS.)	CIVIL ACTION NO.: 1:15-cv-13942
)	
TARGET CORPORATION,)	
EDENS LIMITED PARTNERSHIP,)	
DARTMOUTH (E&A) LLC, and)	
SHEPARD GROUP INC.)	
)	
Defendants)	
_____)	

**PLAINTIFF, GORETTI MEDERIOS' AND DEFENDANT, TARGET CORPORATION'S
JOINT MOTION FOR REMAND**

NOW COMES the Plaintiff, Goretti Medeiros, and Defendant, Target Corporation, by and through counsel and respectfully request that this Honorable Court remand this claim to state court at Suffolk Superior Court where it was originally filed. As grounds for this motion, the Parties state as follows:

- **THE PARTIES' JOINT MOTION TO AMEND TO ADD NON-DIVERSE PARTIES HAS BEEN ALLOWED, DIVERSITY HAS BEEN DESTROYED, THUS THIS CLAIM SHOULD BE REMANDED TO STATE COURT PURUSANT TO 28 U.S.C §1441(e)**

This claim was filed in Suffolk Superior Court on September 9, 2015. Prior Defense Counsel for Target Corporation Filed a Notice of Removal to federal court based on the diversity of the two (2) parties and the amount in controversy and the case was removed on November 25, 2015. As the Court is aware, a contract for snow and ice removal was produced to Plaintiff's counsel at the end of October, 2016. The contract showed additional Massachusetts Defendants that should be parties to this claim. The original parties (Plaintiff, Goretti Medeiros and Defendant, Target Corporation) assented to the amendment of the complaint to add Defendants Edens Limited

Motion allowed. NMG Gorton, USDS 4/28/17